

EXHIBIT 1

CONTAINS HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY INFORMATION

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Attorneys for Defendant
OTTO TRUCKING LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC; Otto
Trucking LLC,

Defendants.

Case No.: 3:17-cv-00939-WHA

**DEFENDANT OTTO TRUCKING LLC’S
OBJECTIONS AND RESPONSES TO
PLAINTIFF WAYMO LLC’S FIRST SET
OF EXPEDITED INTERROGATORIES**

PROPOUNDING PARTY: Plaintiff, WAYMO LLC

RESPONDING PARTY: Defendant, OTTO TRUCKING LLC

SET NO. : One

CONTAINS HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY INFORMATION**RESPONSE TO INTERROGATORY NO. 6:**

Otto Trucking incorporates each of its general objections by reference. Otto Trucking objects to this Request as not “reasonably narrow” or relevant to its “trade secret misappropriation claims *only*” as required by the Court’s Order Granting in Part and Denying in Part Plaintiff’s Motion for Provisional Relief (Dkt. No. 464). Otto Trucking further objects to this Interrogatory to the extent that it seeks information regarding documents or materials protected by the attorney client privilege, the attorney work product doctrine, joint defense or common interest privilege, and/or any other applicable privilege or immunity.

Subject to and without waiving its foregoing objections, Otto Trucking responds as follows: Litigation hold memoranda were sent on March 9, 2017 to Anthony Levandowski, Lior Ron, Brent Schwartz, and Rhian Morgan. Otto Trucking does not possess any of its own servers, computers, electronic or hard-copy document repositories. Any such documents are located and stored on the servers, computers and electronic or hard-copy document repositories of Uber and Ottomotto. As such, any and all litigation holds imposed by Uber and Ottomotto would apply to any Otto Trucking materials. For that reason, Otto Trucking incorporates by reference the responses to this Interrogatory by Ottomotto and Uber.

INTERROGATORY NO. 7:

For each of DEFENDANTS’ past and present officers, directors, and employees identified in response to the Court’s April 4, 2017 Order (Dkt. 144) as having had LiDAR-related responsibilities or projects, identify all LiDAR-related projects that the PERSON has worked on, INCLUDING (without limitation) any LiDAR-related projects involving third parties.

RESPONSE TO INTERROGATORY NO. 7:

Otto Trucking incorporates each of its general objections by reference.

Subject to and without waiving its foregoing objections, Otto Trucking responds as follows: None of the past and present officers, directors, and employees identified in response to the Court’s April 4, 2017 Order (Dkt. 144) have worked on any LiDAR-related projects in their capacities as past or present officers, directors, or employees of Otto Trucking.

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1 attorney work product doctrine, joint defense or common interest privilege, and/or any other
2 applicable privilege or immunity.

3 Subject to and without waiving its foregoing objections, Otto Trucking responds as
4 follows: Counsel for Otto Trucking provided a copy of the redacted version of the Court’s order
5 Granting in Part and Denying in Part Plaintiff’s Motion for Provisional Relief to Mr. Levandowski
6 on May 15, 2017. Counsel for Otto Trucking sent a letter by email and Federal Express to Mr.
7 Levandowski’s counsel of record, Ramsey Ehrlich LLP, on May 30, 2017 regarding the
8 admonitions in the order and requesting that he return any Downloaded Materials, as described in
9 the order.

10 Dated: June 5, 2017

Respectfully submitted,

11 By: /s/ Neel Chatterjee

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27 Attorneys for Defendant
28 OTTO TRUCKING LLC


VERIFICATION

I, Rhian Morgan, declare that I have read a copy of Otto Trucking LLC's OBJECTIONS AND RESPONSES TO PLAINTIFF WAYMO, LLC'S FIRST SET OF EXPEDITED INTERROGATORIES and am familiar with its contents.

I am Corporate Secretary at Otto Trucking LLC, a party to this action, and am authorized to make this verification for and on its behalf. I am informed and believe and on that basis state that the responses provided therein are true and correct.

I certify under penalty of perjury that the foregoing is true and correct.

Executed this 5 day of June, 2017 in San Francisco, California.


Rhian Morgan
Corporate Secretary
Otto Trucking LLC